

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

United States District Court
Southern District of Texas
FILEDfor the
Southern District of Texas

AUG 13 2020

David J. Bradley, Clerk

United States of America
v.

Case No.

Maria NAJERA
YOB: 1981 MX

M-20-1530 -M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 12, 2020 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC § 952
21 USC § 841

Knowingly and intentionally import into the United States from the United Mexican States approximately 57.2 kilograms of methamphetamine a Schedule II controlled substance, and did knowingly and intentionally possess with the intent to distribute approximately 57.2 kilograms of methamphetamine a Schedule II controlled substances.

This criminal complaint is based on these facts:

See "Attachment A"

☒ Continued on the attached sheet.Submitted by reliable electronic means, sworn to, and attested to telephonically,
per Fed. R. Cr. P. 4.1, and probable cause found on:

/s/ John Rienosa

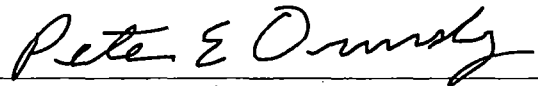
Complainant's signature

Approve by Robert Guerra AUSA

John Reinosa / Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/13/2020 11:21 a.m.

Judge's signature

City and state: McAllen, TX

Peter E. Ormsby, US Magistrate Judge

Printed name and title

Attachment "A"

On August 12, 2020, Maria NAJERA, a lawful permanent resident, applied for admission into the United States at the Anzalduas Port of Entry. NAJERA was operating a Ford Explorer and was the sole occupant. NAJERA was referred to secondary inspection.

During a secondary inspection, a Customs and Border Protection Officer (CBPO) K-9 alerted to the vehicle. A subsequent x-ray scan of the vehicle revealed anomalies within all four of the vehicle's tires. A CBPO drove the vehicle from the x-ray portal to the secondary inspection area and noticed the vehicle drove abnormally and made audible thumps as it drove. An in-depth search of the vehicle tires led to the discovery of packages weighing a total of 57.2 kilograms containing a crystal-like substance that field tested positive for the properties of methamphetamine, a schedule II controlled substance.

Homeland Security Investigations (HSI) Special Agents (SAs) responded to the Hidalgo POE for investigative assistance and conducted an interview of NAJERA. During the interview, NAJERA made multiple inconsistent and contradictory statements about the timeframe of ownership of her vehicle. NAJERA also provided SAs with inconsistent and contradictory statements about her itinerary while in Mexico.

Based on the way the narcotics were concealed within the vehicle, the fact that the vehicle was obviously driving abnormally, and the multiple inconsistent and contradictory statements provided by NAJERA the HSI SA believe that NAJERA had knowledge of the existence of the narcotics when she drove the vehicle from Mexico into the United States. Based on the training and experience of the HSI SA on the scene such smuggling attempts are common in the Rio Grande Valley and the narcotics are imported with the purpose of transferring the narcotics to another individual once the importation is completed.